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May 11, 2007

**VIA ELECTRONIC FILING**

Mr. Richard Arsenault  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**RE:** Notice of Written ~~Ex~~ Parte Presentation:  
RM No.11355 and WT Docket No. 01-108; DA 07-131

Dear Mr. Arsenault:

AT&T Mobility LLC f/k/a Cingular Wireless LLC ("AT&T") is pleased to update the record on the analog sunset status. As you know, Section 22.902(b) of the Commission's rules requires that cellular carriers support analog technology until February 18, 2008. AT&T filed its Second Analog Sunset Report informing the Commission of the progress AT&T has made towards the analog to digital transition on February 20, 2007. As of April 30, 2007, AT&T has approximately 81,000 retail customers who were using analog-only handsets. This number represents a significant decrease from our last report which stated we had 315,000 analog customers remaining. Some of the decrease in number of analog customers resulted from normal attrition due to deactivations and migrations to our digital network. Part of the decrease in analog customers was the recognition that incompatible billing systems between the former Cingular and the former AT&T Wireless had resulted in the misclassification of a large number of legacy digital subscribers as analog. Our information technology department implemented a solution to this problem in early April, and our data now more accurately reflects the analog-only retail customers remaining on the AT&T network. The estimated cost to AT&T of maintaining an analog network past the February 20, 2008 sunset date is approximately \$8 Million/month, depending upon variables such as cost of utilities.

We also would like to provide an update on options available to our "bag phone" customers. In October, 2006, AT&T Mobility, as Cingular, certified the Motorola M900 bag and mobile phones. These phones have a maximum power output of 1 watt at GSM 1900 and 2W at GSM 850. These products are currently available for use on AT&T's network. We are exploring how to inform customers of this product; e.g., improved search feature on our website, and how to make these products available through our retail channels. These products allow our "bag phone" or mobile phone analog customers the option to transition to an equivalent product on the more advanced digital network.

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The benefits of digital service versus analog service are clear. Digital networks are more spectrum efficient and allow AT&T to offer a wider array of advanced services. AT&T supports the Commission in its desire to abolish the analog requirement on February 20, 2008 and is proceeding to make this a successful transition.

Pursuant to section 1.1.206(b) (1) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. Please direct any questions regarding this filing to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Arsenault", written over a light gray rectangular background.